

1 GARY A. MODAFFERI, ESQ.
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3 LAW OFFICES OF GARY A. MODAFFERI, LLC.
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9 UNITED STATES DISTRICT COURT
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11 DISTRICT OF NEVADA
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13 UNITED STATES OF AMERICA,) CASE NO: 2:21-cr-00199-GMN-DJA
14)
15 Plaintiff,)
16)
17 vs.)
18) **STIPULATION TO CONTINUE**
19) **SENTENCING HEARING**
20)
21 HECTOR VASQUEZ,) (First Request)
22)
23 Defendant.)
24)
25)
26)
27)
28)

29 **IT IS HEREBY STIPULATED AND AGREED** by and between JASON M.
30 FRIERSON, United States Attorney, and JEAN RIPLEY, counsel for the United States of
31 America, CASSANDRA BARNUM, Trial Attorney for the United States Department of Justice;
32 and GARY A. MODAFFERI, counsel for Defendant, HECTOR VASQUEZ, that the sentencing
33 hearing currently scheduled for Wednesday, May 31, 2023 at 11:00a.m., be vacated and
34 continued for one hundred twenty (120) days or to a date and time convenient to this Court.

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This request for a continuance is based on the following reasons:

1. Counsel requires additional time to file his objections to the draft presentence investigation report recently received.
2. Co-defendant Morales has recently entered into a guilty plea agreement with the Government and all parties, with Court approval, are seeking a consolidated sentencing hearing.
3. The government and Defendant agree to the continuance.
4. Additional time requested by this Stipulation is made in good faith and not for purposes of delay.
5. Denial of this request for a continuance could result in a miscarriage of justice.
6. This is the first request for continuance of the sentencing hearing.

DATED this 15th day of May, 2023.

JASON M. FRIERSON
UNITED STATES ATTORNEY

Gary A. Modafferi

Jean Ripley

/s/

/s/

GARY A. MODAFFERI, ESQ.
Nevada Bar No. 12450
Attorney for Defendant

Jean Ripley
Assistant United States Attorney
Attorney for Plaintiff

Cassandra Barnum

/s/

CASSANDRA BARNUM
United States Department of Justice
Trial Attorney

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	CASE NO: 2:21-cr-00199-GMN-DJA
)	
Plaintiff,)	
)	
vs.)	
)	ORDER
)	
)	
HECTOR VASQUEZ,)	
)	
Defendant.)	
_____)	

IT IS HEREBY ORDERED that the sentencing hearing currently scheduled for
Wednesday, May 31, 2023 at 11:00a.m., be vacated and continued to October 10, 2023
at the hour of 9:00 AM.

DATED AND DONE this 15 day of May, 2023.


UNITED STATES DISTRICT JUDGE

Respectfully Submitted By:

/s/ Gary A. Modafferi

Gary A. Modafferi, Esq.
Nevada Bar No. 12450
Attorney for Defendant